



THE LAW OFFICE OF  
**MICHAEL A. MARINACCIO**

245 MAIN STREET  
SUITE 420  
WHITE PLAINS, NY 10601

914-761-0707  
(FAX) 914-761-0795

MICHAEL@MAMARINACCIO.LAW.COM  
WWW.MAMARINACCIO.LAW.COM

June 29, 2022

**Via ECF**

Honorable Raymond J. Dearie  
Senior United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

RE: Unites States v. Shelton, et al.  
18-CR-609 (S-3)(RJD)

Dear Judge Dearie:

Pursuant to the Court's Order dated June 22, 2022, on behalf of defendant Himen Ross, we respectfully join in the letter brief submitted by counsel for Anthony Zottola in opposition to the government's motion for an anonymous and partially sequestered jury.

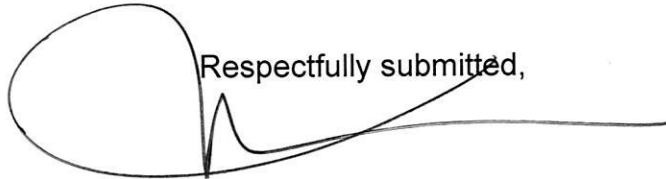
As a supplement to the arguments submitted therein, we note that there are no allegations that Mr. Ross engaged on any obstructive conduct in connection with this matter.

Regarding the government's concern about extensive media coverage, we note as well that a review of the media reports cited demonstrates that primarily "law enforcement" is listed as the source of the reports and NOT the defense teams. Under the circumstances, a directive that the parties refrain from engaging with the press seems a far less intrusive solution to the concerns raised by the government.

**MICHAEL A. MARINACCIO, ESQ.**

Finally, allegations of organized crime involvement appear to be directed mainly at the alleged victims this case.

Accordingly, for the reasons stated in the submission of counsel for Anthony Zottola, we respectfully urge the Court, on behalf of Mr. Himen Ross, to deny the government's application.

 Respectfully submitted,

Michael A. Marinaccio, Esq.

Elizabeth Macedonia, Esq.

Cory Garcia, Esq.  
Counsel for Defendant  
Himen Ross

MAM/jm

cc: All Counsel of Record  
Via ECF

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